



U. S. Steel
Clairton Works
400 State Street
Clairton, PA 15025-1855

July 15, 1999

Mr. Michael McCabe
Deputy Regional Administrator
USEPA Region III
650 Arch Street
Philadelphia, PA 19103-2029

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EPA REGION III
OFFICE OF REGIONAL ADMINISTRATION

Subject: NESHAPS Benzene Waste Operations
40 CFR Part 61.357(c) - Subpart FF Reporting
1997 TAB Report Revisions

Dear Mr. McCabe:

In accordance with requirements of 40 CFR 61.357(c), Benzene Waste NESHAPS Subpart FF, USS Clairton Works is resubmitting annual waste stream information for our coke by-product recovery facility.

Please find attached the revised annual report which identifies benzene waste streams and the corresponding Total Annual Benzene (TAB) quantity for 1997. These revisions result in a change in the reported TAB value from 11.08 Megagrams (MG) per year to a value of 2.90 Mg/year.

The original 1997 submittal included waste streams identified as Nos. 122, 123, 124, 125, 126 and 127 in the TAB determination. These streams are not waste streams as defined at 40 CFR §61.341, but are process streams in the final step of the by-products recovery process and should not have been included in the TAB calculation. Each of these streams originates at process flow equalization tanks and are piped to tar decanters for further processing.

This error was recognized during the 1998 TAB development and USS Clairton Works believes that its 1998 TAB report is correct as submitted, reflecting a TAB value of 2.12 Mg/year.

If you have any questions, you may contact me at (412) 233-1467.

Sincerely,

W.C. Graeser
Manager Environmental Control/Quality Assurance

Attachments
CC: Deputy Director, ACHD (W/O Att.)

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